

AO 91 (Rev. 02/09) Criminal Complaint

Felony

UNITED STATES DISTRICT COURT

for the
Southern District of Texas

United States of America

v.

Joel PUGA

Case No.

B-17-893-MJ

United States District Court
Southern District of Texas
FILED

Defendant

NOV - 8 2017

CRIMINAL COMPLAINT

David J. Bradley, Clerk of Court

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of November 7, 2017 in the county of Cameron in the Southern District of Texas, the defendant violated 18 U. S. C. § 554 and 371 an offense described as follows:

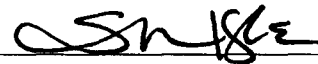
Knowingly conspired to export or send from the United States, or attempt to export or send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, or receives, conceals, buys, sells, or in any manner facilitates the transportation, concealment, or sale of such merchandise, article or object, prior to exportation, knowing the same to be intended for the exportation contrary to any law or regulation of the United States, to wit: 1,000 rounds of .223 caliber ammunition.

This criminal complaint is based on these facts:

On November 7, 2017, United States Customs and Border Protection Officers (CBPOs) at Brownsville and Matamoros Port of Entry, Brownsville, TX, encountered Joel PUGA attempting to depart the United States driving a GMC Acadia. CBPOs conducted an outbound inspection of PUGA and PUGA gave a negative declaration for money, ammunition, and firearms. A secondary inspection of his vehicle revealed 10 boxes of .223 caliber ammunition concealed under the third-row seat of the vehicle. Each box of .223 caliber ammunition contained 100 rounds each for a total of 1000 rounds.

Homeland Security Special Agents interviewed PUGA and he admitted he was to deliver the ammunition to an individual in Matamoros, Tamaulipas, Mexico, for a payment of \$200.00. PUGA stated that he has delivered ammunition to the same individual in Mexico on four (4) previous occasions and was paid approximately \$100.00 each time. PUGA further stated that he knew it was illegal to take ammunition into Mexico and that he has never applied for a license to export ammunition to Mexico.

☐ Continued on the attached sheet



Complainant's signature

Sheila Kyle, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: November 8, 2017City and state: Brownsville, Texas


Judge's signature

Ignacio Torteya III, U.S. Magistrate Judge

Printed name and title